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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation;
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI K. VO IN
SUPPORT OF UNOPPOSED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL JOINT
DISCOVERY LETTER BRIEFS (DKTS. 308 &
309)**

I, Nikki K. Vo, hereby declare:

1. I am Director and Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta's administrative motion to file under seal portions of the Parties' Joint Discovery Letter regarding Meta's responses to Plaintiffs' Requests for Production Nos. 118 and 119 (“RFP Joint Letter Brief”) and Joint Discovery letter regarding Meta's privilege redactions (“Privilege Letter Brief”). The motion seeks to have the following partially sealed:

Document	Sealing Request
RFP Joint Letter Brief	<ul style="list-style-type: none"> Redacted portions
Privilege Letter Brief	<ul style="list-style-type: none"> Redacted portions

3. The redacted portions of the RFP Joint Letter Brief refer to Meta's highly sensitive, confidential practices and processes surrounding its Llama models and the datasets used to train the Llama models. The information in the redacted portions is based on documents produced by Meta designated “Highly Confidential – Attorneys' Eyes Only” and “Confidential” under the Stipulated Protective Order. Public disclosure of the information contained in these portions exposes Meta to the risk of competitive harm.

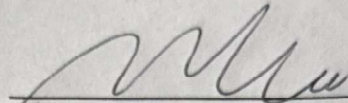
4. The redacted portions of the Privilege Joint Letter Brief contain significant discussion and descriptions, including quotes from the confidential documents themselves, of Meta's highly confidential internal communications and documents. These documents and communications were produced in this litigation and marked “Highly Confidential – Outside Attorneys' Eyes Only.” Public disclosure of the information contained in these portions exposes Meta to the risk of competitive harm.

5. Public disclosure of the redacted information in the documents above exposes Meta to the risk of competitive harm by revealing Meta's non-public information pertaining to the

1 development of its generative AI offerings, as well as its confidential business strategies, processes,
2 and relationships. Meta takes steps to carefully protect the confidentiality of information of this
3 sort.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct

6 Executed in Oakland, California on this 4th day of December, 2024.

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9 _____
Nikki K. Vo

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